

United States Environmental Protection Agency Region 10 Emergency Response Unit POLLUTION REPORT

I. HEADING

Date: June 26, 2000

Subject: CleanCare Removal Site (CleanCare), Tacoma, Washington

From: Michael Szerlog, OSC, USEPA, Region 10, Emergency Response Unit

Tel: Office (206) 553-0279

TO: See Distribution List on last page

POLREP No. 28 (Progress)

II. BACKGROUND

Site ID: SSID # 106W
Delivery Order No: 081-10 -02
Response Authority: CERCLA,

CERCLIS No: WASFN1002182

NPL Status: Not Listed (former RCRA site within

Commencement Bay Superfund site)

State Notification: Washington State Department of Ecology referred

site to EPA

Action Memo Status: Signed on December 17, 1999 and January 7, 2000

Removal Start Date: December 17, 1999

Expected Completion Date: March 17, 2001

Site Web Page: www.epa.gov/r10earth, click Index, click C for

CleanCare. or use URL:

http://yosemite.epa.gov/r10/cleanup.nsf/

sites/CleanCare

III. SITE INFORMATION

A. Incident Category

This is a time-critical removal action at an inactive waste management facility.

B. Site Description

1. Site Location

The CleanCare site is located at 1510 Taylor Way in Pierce County, City of Tacoma, Washington at Township 21, Range 3 E. in Section 26. The site comprises approximately 4.2 acres latitude 47° 16' 25" North and longitude 122° 23' 32" West. The site is located in the "Tacoma Tideflats" area about three miles northeast of downtown Tacoma. The site is owned by David Bromley of Bromley-Marr ECOS Inc.

The CleanCare site was an interim status treatment, storage, disposal, and recycling (TSD) facility for off-site generated hazardous and non-hazardous wastes - one of a handful of commercial TSDs operating in the state of Washington. When the facility was in operation its major function was to solidify oily sludge wastes originating from catch basins, sumps, and storm drains; recycle waste oils, antifreeze, and spent solvents; and crush used oil filters for off-site recycling by other facilities.

The CleanCare facility has four separate tank farms (Tank Farm (TF)-1, TF-2, TF-3, and TF-4), two hazardous/dangerous waste container storage pads (container storage (CS) CS-4A and CS-4B), and a processing area where the distillation of solvent, oil, and antifreeze used to occur.

IV. Response Information

A. Situation

1. Current Situation

Monday Jun 19, 2000 (Monday)

Personnel on site: 2 START, 9 ERRS, 1 USCG, 1 EPA

Weather: Overcast, cool - 60s F to partly cloudy warm in the afternoon. All site personnel attended daily safety meeting and discussed site safety/planned activities. START prepared weekly activities log and cost summary for inclusion in the weekly polrep, escorted representatives from Van Waters and Rogers to inspect remaining vendor drums (eight drums containing product were agreed to be removed by the vendor

WW&R), sampled Baker Tank #22 (Batch 22) treated wastewater for discharge to Tacoma sanitary sewer. USCG met with EPA OSC to review safety plan and site operations, continued routine air monitoring throughout the site, (air monitoring data was below the onsite action level) ensured that unauthorized personnel were not allowed on site and that all personnel entering the site were properly checked in with required safety equipment, conducted site safety, completed pollution report. ERRS started removing air stripper media from tank 34, continued with sludge solidification, sampled water in tank 22, cleaned tank 34, cleaned all of the tanks in tank farm 1 and 2, continued emptying aerosol cans and continued with water treatment.

Jun 20, 2000 (Tuesday)

Personnel on site: 2 START, 9 ERRS, 1 USCG, 1 EPA

Weather: Sunny, warm, light breeze 70s F

All site personnel attended daily safety meeting and discussed site safety/planned activities. START continued to document site activities, investigated existing process areas for methods to best evacuate system lines, investigated on site fire suppression system for use when waste oil still is drained, and developed background text for final report. USCG continued routine air monitoring throughout the site, (air monitoring data was below the onsite action level) ensured that unauthorized personnel were not allowed on site and that all personnel entering the site were properly checked in with required safety equipment, conducted site safety. ERRS continued removing air stripper media from tank 34, continued with sludge solidification, Haz-Catting remaining drums, finished cleaning tank 34, Waste Management removed two boxes of solidified sludge (38,000 lbs), continued emptying aerosol cans, Van Waters & Rogers removed 8 (55 gal) drums of product.

Jun 21, 2000 (Wednesday)

Personnel on site: 3 START, 9 ERRS, 1 USCG, 2 EPA

Weather: Sunny, warm, light breeze, 70s F

All site personnel attended daily safety meeting and discussed site safety/planned activities. START investigated heat stress safety and monitoring concerns, revised sampling plan, developed the discharge request for the city of Tacoma and continued report writing and oversight.

USCG continued routine air monitoring throughout the site, (air monitoring data was below the onsite action level), escorted State and Phillips Services personnel on site to collect groundwater samples from on site wells (Phillips is a neighboring facility conducting its own groundwater study), ensured that unauthorized personnel were not allowed on site and that all personnel entering the site were properly checked in with required safety equipment, and conducted site safety.

ERRS continued Haz-Catting and separating drums (i.e.,acids,bases), pumped out the liquid (oil product) from remaining drums, started emptying sludge out of remaining containers, assisted Safety Kleen with removing 3,500 gallons of product from Tank 18.

<u>Jun 22, 2000 (Thursday)</u>

Personnel on site: 2 START, 8 ERRS, 1 USCG Weather: Cloudy to partly cloudy, cool 50-70s F.

All site personnel attended daily safety meeting and discussed site safety/planned activities. START continued to write portions of the final report, investigated soil sampling options, and evaluated air monitoring data from the USCG. USCG continued routine air monitoring throughout the site, (air monitoring data was below the onsite action level), escorted authorized personnel to groundwater well sites for sampling and measurement, ensured that unauthorized personnel were not allowed on site and that all personnel entering the site were properly checked in with required safety equipment, conducted site safety. ERRS continued water treatment system, resumed Haz-catting drums, continued pumping liquid (oil products) from drums, emptied sludge from containers, attempted filtering oil from Tank farm 3, Philips removed two oily debris boxes (40 yds).

June 23, 2000 (Friday)

Personnel on site: 2 START, 8 ERRS, 1 USCG

Weather: Sunny and clear, 60-70s F. All site personnel attended daily safety meeting and discussed site safety/planned activities. START evaluated potential soil sampling options, evaluated asphalt cap options and specifications, and received approval to discharge (Batch 22) from the City of Tacoma. USCG continued routine air monitoring throughout the site, (air monitoring data was below the onsite action level), escorted person from Emerald Services to sample formerly owned CleanCare truck beds, ensured that unauthorized personnel were not allowed on site and that all personnel entering the site were properly checked in with required safety equipment, conducted site safety. ERRS continued water treatment system, resumed Haz-catting drums, continued pumping liquid (oil product) from drums, emptied sludge from containers, started pumping solvent from process area into tank farm 4 tanks, continued solidification of oil in sludge boxes, cleaned Rain-4-Rent temporary storage tank #23.

2. Removal Actions to Date

On January 7, 2000, the Action Memorandum to increase site ceiling, to ask for a \$2 million exemption, a 12-month exemption, and a change of

scope was signed. A purchase request was also signed and ERRS was funded, incrementally, to begin removal activities.

The State (Washington Department of Ecology) continues to provide concurrence on waste designation. The City (City of Tacoma Public Works) continues to provide assistance with discharge of treated waste water.

RCRA Drums: Finished segregation and inventory of all non oil filter drums known to be located on the site (formerly referred to as RCRA drums). Selected generators have removed a total of 570 drums and 12 totes of waste. Remaining drums undergoing segregation and bulking with similar waste streams prior to disposal. Approximately 700 empty RCRA drums were removed from the site by Emerald Services.

Oil Sludge Drums: Sludges from miscellaneous drums are being bulked and solidified on site and then transferred by Waste Management to Arlington Landfill.

<u>Antifreeze Drums:</u> Bulked with material from Tank 25 and transported from site by Ecco to Kennewick for recycling.

<u>Solvent Drums:</u> All solvent drums have been disposed of under contract with Safety Kleen.

<u>RCRA Debris:</u> Drums and debris are being solidified and disposed under contract with Philip Services.

<u>Baker Tanks®</u> - A total of 10 Baker Tanks are currently on site. Baker Tanks are being used to stock bulked materials, store treatment system waters, and store material from tank farms prior to disposal.

<u>Surface Water</u> - Continued treating site surface water and decontamination water with the temporary waste water treatment system. Treated and discharged of 20 batches to date (approximately 400,000 gallons total) of waste water to the City of Tacoma Sanitary Sewer System. Two batches (approximately 40,000 gallons) did not meet the pretreatment requirements established by the city and were disposed off site.

ASTs -All tanks in Tank Farms 1 & 2 are empty of fluids, having been removed and transported by Emerald Services, Solpro, Prime Environmental, Chemical Waste Management (specifics tabulated in section VI). Tank Sludges are in the process of being solidified and subsequently transported by Chemical Waste Management to Arlington

landfill for final disposition. Materials from Tank Farms 3 & 4 have been characterized and are currently being bid for final disposal. The oil and sludge from Tank 33 were solidified with other project oil sludges. Tank 34 water is being treated via precipitation of heavy metals followed by filtration, oil water separation and activated carbon absorption. After analytical confirmation of water quality standards the treated waters are discharged to the sanitary sewer with the approval from the City of Tacoma. Determined disposal facilities for materials in TF 3 (Tanks T-18 through T-25), and TF 4 (Tanks T-26 through T-29).

<u>Soil -</u> An evaluation of soil treatment/disposal options is under review. No work on site was performed this week regarding soils. To date, 14 soil samples were collected during the assessment phase to characterize site soils.

3. Enforcement

The Region currently has some information regarding potential responsible parties (PRPs) at the site. Relevant facility files and documentation have been transported to a secured federal building. EPA intends to gather additional PRP information during the removal action.

B. Planned Removal Activities

To minimize/eliminate the threat to human health and the environment posed by the wastes on the site, the following removal activities are planned:

<u>Drums:</u> continued organization of drums and documents (manifests & profile analyses), hazard categorization and disposal tests, bulking and removal of containers from the site.

<u>Baker Tanks®:</u> The decontamination water from some tanks will continue to be treated on site and discharged. Emptied tanks that have no further use on site will be returned to the rental company.

<u>Surface Water:</u> management of surface water as it collects onsite (including sampling, treatment, and discharge), and treatment of AST water that meets the treatment criteria.

ASTs: Complete disposal of the sludge phase from Tank Farms 1 & 2. Continue disposal of the remaining liquids from Tanks 4 and 5. Continue removal activities of material from Tank Farm 3 and 4.

<u>Miscellaneous Containers</u>: Characterization and sampling of approximately 10-20 large (50 to 200 gallon) containers on-site, completed. Material will be bulked according to waste stream for disposal off site.

C. Next Steps

EPA, ERRS, START, and the USCG Strike Team will continue managing onsite surface water. Continued data management including data for all remaining drums as well as analytical data for materials stored in the ASTs. Continued treatment and discharge of contact and non-contact surface water. Transfer material from Tank Farms 3 and 4 for disposal off site. Continue to solidify sludges for disposal at Arlington Landfill. Continue to bulk material in Baker Tanks® and decontaminate tanks after material is disposed of, prepare and load PRM drums for Philips to transport, stage miscellaneous drums for labeling, haz-catting and disposal. Prepare for the demolition and decontamination of tanks in Tank Farm 1.

D. Key Issues

Security: Off Duty City of Tacoma Police continue with site security.

Management of site surface water: Contact surface water (that which falls within the secondary containment structures) and non-contact water has been either treated on site or disposed off site. On site water treatment is performed in 20,000 gallon batches. Each batch is sampled, laboratory results are submitted to the City of Tacoma, and, with the City's approval, each batch is discharged to the Sanitary Sewer System. Previously some surface water was also disposed off site. Performing both tasks simultaneously reduced the length of time required to accomplish this task, reduced the associated costs, such as Baker Tank® rental fees, and removed the threat of a release. Currently, managing the surface waters with the temporary onsite treatment system is sufficient.

<u>Drum/Container Waste:</u> All 64 of the original generators that were given the opportunity to dispose of their wastes have done so. A total of 582 containers of waste were removed from the site by these generators, saving the EPA disposal costs. Other containers of waste are haz-catted, staged with similar compatible wastes, bulked and disposed as appropriate.

On-site facility files: Approximately eight hundred boxes of facility files and documents were transported to a secured federal facility.

V. Cost Information

Estimated costs are summarized below

	Established Ceiling	Estimated Costs as of date listed, percent of budget expended
EPA	\$300,000	\$148,113 (6/23) 49.37%
START	\$ 676,500	\$474,489 (6/23) 70.14%
ERRS*	\$ 3,000,000	\$2,555,214 (6/25) 96.97%
Coast Guard	\$100,000	\$109,181 (6/26) 109.18%
Total	\$ 4,076,500	\$3,286,997 80.63%

^{*} reflects ceiling increase of \$400,000 for the ERRS contractor.

Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

VI Disposition of Wastes

Waste Stream	Medium	Quantity	Containment- Migration Control	Treatment	Disposal
Used Oil Filters	solid and solidified waste	270 cu yd	placed liners in reliefs	removed oil filters from 55 gallon drums and consolidated in reliefs	Waste Management delivered to Olympic View Sanitary Landfill
Used Oil Filter Drums	solid waste	170 cu yd	placed liners in reliefs	crushed drums with an excavator to reduce volume	Phillips Services Corp. Delivered to Burmingham Steel for recycling.
Used RCRA Drums	solid waste	164 cu yd	placed liners in reliefs	crushed drums with an excavator to reduce volume	Phillips Services Corp. Delivered to Columbia Ridge Landfill.
	Solid waste	700 Drums	placed liners in reliefs	Hauled from site to be decontaminated	Emerald transferred from site to be decontaminated and reused
Generator Drums	sludge and liquids	570 drums and 12 totes	NA	generators contracted with TSDs to properly manage their waste	Brought to various disposal companies
Oily Debris	solidified waste	20 cu yd	placed liners in reliefs	consolidated in reliefs	Phillips Services Corp. delivered to Olympic View Sanitary Landfill
Contact Rain Water	liquid	349,708 gal	contained in Baker Tanks®	Emerald Petroleum Services's (EPS) water treatment plant	EPS treated and transported to City of Seattle Sanitary Sewer
Contact Rain Water	liquid	123,400 gal	contained in Baker Tanks®	Phillips Services Corp. water treatment plant	Phillips Services Corp. treated and transported to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	400,000 gal	contained in Baker Tanks®	treated on site with temporary waste water treatment system	to City of Tacoma Sanitary Sewer
Baker Tanks®	solid	Tank	NA	pressure washed, and wiped down	returned to Vendor (Baker Tanks®, Inc.)
Tip Trailers	solid	13 trailers	NA	transported off site to make room for other activities	temporarily stored at the Phillips Services Corp. facility adjacent to the site
Oil From Drums	liquid	142 drums + 4 totes	6,900 gallon poly tank on site	Transported off site for disposal	Removed by Emerald Petroleum with material from Tank 1
Antifreeze from Drums	liquid	65 drums	Bulked into Baker Tank® # 18	transported by Spencer	Delivered to Onyx for recycling
Tank Farm 1 Oily Water	liquid	21,100 gal	Bulked into Baker Tank® #10	transportation to be determined	to be determined
Solidified oil sludge	solid	654,000 lbs	in sludge pits	Transported from site	Waste Management transported to Arlington landfill
Tank 1 Layer 1	liquid	73,225 gal	Transferred to Vac Truck	transported by EPS	Delivered to EPS for recycling
Pallets	solid	21,000lbs	stacked in back lot	Transported from site	Burned off site by Recovery1

Waste Stream	Medium	Quantity	Containment- Migration Control	Treatment	Disposal
Tank 1 Layer 2	liquid	34,437 gal	Transferred to Vac Truck	transported by Phillips Services Corp.	Delivered to Phillips Services Corp for recycling
Tank 1 Layer 3	liquid	168,269 gal	Transferred to Vac Truck (74,169 gal) Transferred to Baker Tank® for temporary storage (20,000)	transported by Waste Management	Delivered to Waste Management facility in Arlington, OR for solidification and disposal
Tank 1 Layer 4	liquid	155,904 gal	Transferred to Vac Truck	transported by Emerald	Delivered to Emerald facility in Seattle for recycling
A-Fuel/Solvent from Drums	liquid	24,000 gal	Bulked into Baker Tank® #9	10,000 gallons transported off site by Safety Kleen	Delivered to Araganite facility in Utah for recycling
Glycol From Drums	liquid	5,000 gal	Bulked into Baker Tank® #18	transportation to be determined	to be determined
PRM Drums	Solid Waste	80 55-gallon drums	Transferred to Philips	Transferred by Philips Services Corp.	Delivered to Philips Services Corp for recycling
Tank-30 Wastewater	liquid	10,371 gal	Transferred to Vac Truck	Transferred by Emerald	Delivered to Emerald for treatment
Tank 5	liquid	44,165 gal	Transferred to Vac Truck	Transferred by Solpro/Prime	Delivered to Solpro/Prime for disposal
Tank 4	liquid	105,074 gal	Transferred to Vac Truck	Transferred by Solpro	Delivered to Solpro for disposal
Tank 5	oily water	24,500 gal	Transferred to Vac Truck	Transferred by Prime	Delivered to Prime for disposal
Tank Farm 2	liquid	62,724	Transferred to Vac Truck	Transferred by Emerald	Delivered to Emerald for disposal
Tank Farm 2	oily water	48,239 gal	Transferred to Vac Truck	Transferred by Emerald	Delivered to Emerald for disposal
Tank 3	Liquid	112,705 gal	Transferred to Vac Truck	Transferred by Solpro	Delivered to Solpro for disposal
Tank 21	Liquid Diesel	4,150 gal	Transferred to Vac Truck	Transferred by Safety Clean	Transported to Anacortes for recycling
Vendor Drum	Product Drums	8 55-gallon drums	Transferred to VanWaters & Rodgers	Transferred by VanWaters and Rodgers	Transported for resale or use

Waste Stream	Medium	Quantity	Containment- Migration Control	Treatment	Disposal
Tank 5 Layer 2	liquid	9,789 gal	Transferred to Vac	Transported by Emerald	Delivered to Emerald for recycling
Tank 25	Liquid Glycol	8,000gal	Transferred to Vac Truck	Transported by Ecco	Delivered to Kennewick for recycling

VII Distribution

To: EPA Headquarters, Washington, D.C. Attention: Terry Eby
EPA Region 10, Emergency Response Unit, Attention: Chris Field
EPA Washington Operations Office, Attention: Thomas Eaton
Puy allup Tribe of Indians, Tacoma, Attention: Joe Edgell
Washington State Department of Ecology, Attention: Jim Sachet
City of Tacoma Public Works Department, Attention: Michael Kennedy
EPA Region 10 Web page, Attention: Beth Kunz
EPA Region 10, Emergency Response Unit, Attention: OSCs

VII Status

Case Pending.